

# PROPOSED SUBSTANTIAL AMENDMENT FOR THE EMERGENCY SOLUTIONS GRANTS PROGRAM

## **Program Year 2011**

---

CITY OF MILWAUKEE,  
WISCONSIN

---

Submitted to the  
U.S. Department of Housing & Urban Development  
by the  
Community Development Grants Administration  
City Hall – 200 East Wells Street; Room 606  
Milwaukee, Wisconsin  
Steven L. Mahan, Director

---

Funds Provided by the U.S. Department of Housing & Urban Development

## **Substantial Amendment to the Consolidated Plan 2011 Annual Action Plan for the Emergency Solutions Grants Program**

Grantees eligible to receive funds under the Emergency Solutions Grants Program(ESG) are required to complete a substantial amendment to their Consolidated Plan 2011 Annual Action Plan. This amendment is due to HUD no later than May 15, 2012.

### **A. General Information**

<b>Grantee Name</b>	City of Milwaukee-Community Development Grants Administration
<b>Name of Entity or Department Administering Funds</b>	Community Development Grants Administration
<b>ESG Contact Person</b> (person to answer questions about this amendment and ESG)	Steven L. Mahan
<b>Title</b>	Director
<b>Address Line 1</b>	City Hall-200 East Wells Street-Room 606
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	Milwaukee, Wisconsin 53202
<b>Telephone</b>	(414) 286-3647
<b>Fax</b>	(414) 286-5003
<b>Email Address</b>	<a href="mailto:smahan@milwaukee.gov">smahan@milwaukee.gov</a>
<b>Authorized Official</b> (if different from Contact Person)	
<b>Title</b>	
<b>Address Line 1</b>	
<b>Address Line 2</b>	
<b>City, State, Zip Code</b>	
<b>Telephone</b>	
<b>Fax</b>	
<b>Email Address</b>	
<b>Web Address where this Form is Posted</b>	<a href="http://www.city.Milwaukee.gov/Community%20Development310.htm">www.city.Milwaukee.gov/Community Development310.htm</a>

## **Narrative**

### **A. Requirements for Preparation**

#### **1. Consultation**

- **Consult with the local Continuum of Care within the geographic area on:**
  - **determining how to allocate ESG funds for eligible activities;**
  - **developing performance standards for activities funded under ESG;**  
**and**
  - **developing funding, policies and procedures for the operation and administration of HMIS.**

#### **2. Citizen Participation**

- **Follow existing citizen participation plan for completing the substantial Amendment**

### **B. Required Content of Substantial Amendment**

#### **1. Signed SF-424 (attached)**

#### **2. Summary of Consultation Process**

- **Describe how the recipient(City) consulted with the Continuum of Care on:**
  - **Determining how to allocate ESG funds for eligible activities;**
  - **Developing the performance standards for activities funded under ESG**  
**and**
  - **Developing funding, policies and procedures for the operation and administration of the HMIS**

**Response:** The development of the Emergency Solutions Grant allocation plan, performance standards and HMIS operation and administration policies and procedures represents the City of Milwaukee's partnership with the Milwaukee Continuum of Care. The Milwaukee Continuum of Care (COC) is the entity charged with the coordination of HUD Supportive Housing Program funding, the development and implementation of Milwaukee's *10 Year Plan to End Homelessness* and coordination of the *Point in Time Survey of Milwaukee's Homeless Citizens*. The Milwaukee COC is representative of the full spectrum of homeless services providers with 100 organizational members. Furthermore, the COC has the planning and accountability structure necessary to insure that ESG funds have maximum impact on the complex issues of homelessness for youth, single adults, families and victims of domestic violence. To develop the ESG allocation plan; policies, procedures and performance standards for ESG activities and HMIS operation and administration, COC leadership convened five discussion and planning groups including representation from family homeless services providers, homeless youth-serving

agencies, homeless adult service providers, domestic violence homeless service providers and legal services organizations representing low-income clients. Representatives of 10 organizations met to discuss utilization trends, alignment with national objectives, identification of programming priorities and adherence to the HEARTH Act and ESG regulations. Resources used in this process include the *2011 Point in Time Survey of Milwaukee's Homeless Citizens*, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness* and the *Milwaukee Continuum of Care 10-Year Plan to End Homelessness*. The following organizations jointly developed the ESG allocation plan and the policies, procedures and performance standards for ESG activities: Cathedral Center, Community Advocates, Guest House of Milwaukee, Hope House of Milwaukee, Pathfinders of Milwaukee, Salvation Army, Sojourner Family Peace Center, Walker's Point Youth and Family Center, St. Aemilian-Lakeside and Legal Action of Wisconsin. The Milwaukee COC Steering Committee ESG Workgroup approved the ESG Allocation Plan, Performance Standards and HMIS operation and administration policies and procedures recommendations, developed by the 10-organization planning group. The HMIS Lead Agency develops the policies and procedures for the operation and administration of HMIS, Wisconsin Service Point. The HMIS Lead Agency for the Milwaukee COC is the State of Wisconsin. The Milwaukee COC has 1.5 FTE funded positions dedicated to HMIS including the COC HMIS Coordinator and a Data Management Assistant.

### **3. Summary of Citizen Participation**

- **summarize the citizen participation process used;**
- **summarize the public comments or views received; and**
- **summarize the comments or views not accepted and include the reasons for not accepting those comments or views.**

**Response:** To ensure adequate and accessible citizen participation, the City of Milwaukee prepared a "draft" of the Substantial Amendment for the Emergency Solutions Grant (ESG) Program. The public comment period for review of the draft Plan is March 9, 2012 through April 10, 2012. CDGA notified funded community agencies, elected officials and other interested persons and also published the report on the City's website. A notice of the document's availability was also published in the following publications on the dates listed below. Copies are on file for public review at the CDGA offices and the City's Legislative Reference Bureau.

- 1) Milwaukee Journal, March 2, 2012
- 2) Milwaukee Community Journal, March 2, 2012
- 3) El Conquistador, March 2, 2012

In addition, CDGA welcomes the views and input of citizens and other stakeholders as it pertains to the any reports disseminated to the public. Any comments, letters or other correspondence received are considered and are included in reports submitted to HUD.

#### 4. Matching Requirements

- Describe:
  - types of cash and/or non-cash resources used as match
  - specific amounts of resources used as match
  - proposed uses of match resources

<b>Types of Cash or Non-cash resource used as match</b>	<b>Match Amount</b>	<b>Use of Match</b>
Community Development Block Grant, Milwaukee County, Private Foundations & Donations, United Way	\$416,338	Housing Stabilization and Relocation Services, Housing Stability Case Management, Housing Search & Placement, Mediation, Tenant-Based Rental Assistance

## **5. Proposed Activities and Overall Budget**

### **a. Proposed Activities**

- **All recipients must include the following details for each proposed activity:**
  - 1) corresponding priority needs from recipient's Annual Action Plan**
  - 2) concise description of the activity, including the number and types of persons to be served**
  - 3) corresponding standard objective and outcome categories**
  - 4) start date and completion date**
  - 5) ESG and other funding amounts**
  - 6) one or more performance indicators**
  - 7) projected accomplishments, in accordance with each indicator, to be made within one year**
  - 8) projected accomplishments, in accordance with each performance Indicator, to be made over the period for which the grant will be used for that activity.**

See 2011 ESG Activity Chart beginning on the following page.

## 2011 ESG ACTIVITY CHART

Agency	Priority Need	Activity Description	HUD Objective	HUD Outcome	Start & End Date	HUD Performance Indicator	2011 proposed Accomplishments (in accordance w/performance indicator)	Total ESG amount	Other Funding Amounts
Community Development Grants Administration	Administration	n/a	n/a	n/a	Once HUD signs grant agreement	n/a	n/a	\$50,000	
Community Development Grants Administration	HMIS	n/a	n/a	n/a	Once HUD signs grant agreement	n/a	n/a	\$10,000	
Community Advocates, Inc.	Homelessness Prevention	Housing Relocation & Stabilization Services	Decent Housing	Availability/ Accessibility	Once HUD signs grant agreement	# low income persons achieving housing stability, safety & independence	1,000	\$60,000	\$60,000
Community Advocates, Inc.	Homelessness Prevention	Tenant-Based Rental Assistance	Decent Housing	Availability/ Accessibility	Once HUD signs grant agreement	# low income persons achieving housing stability, safety & independence	1,000	\$236,338	\$236,338
Pathfinders, Inc.	Homelessness Prevention	Housing Relocation & Stabilization Services	Decent Housing	Availability/ Accessibility	Once HUD signs grant agreement	# low income persons achieving housing stability, safety & independence	15	\$10,000	\$10,000
Pathfinders, Inc.	Homelessness Prevention	Tenant-Based Rental Assistance	Decent Housing	Availability/ Accessibility	Once HUD signs grant agreement	# low income persons achieving housing stability, safety & independence	15	\$20,000	\$20,000
St. Aemilian-Lakeside	Homelessness Prevention	Tenant-Based Rental Assistance	Decent Housing	Availability/ Accessibility	Once HUD signs grant agreement	# low income persons achieving housing stability, safety & independence	27	\$30,000	\$30,000

## **5b. Discussion of Funding Priorities**

- **Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally-relevant data to support the funding priorities, and explain how the funding priorities will support the National priorities established in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*).**

**Response:** The City of Milwaukee, in consultation with the Milwaukee Continuum of Care, chose to fund the proposed activities based on the success of the HPRP Homelessness Prevention strategies in preventing individuals and families from becoming homeless. The success of the Homelessness Prevention Mediation program was shown to have an impact on the amount of eviction filings in Milwaukee County as documented in *Evictions in Milwaukee County 2008-2009: Estimating the Impact of Aid from the American Recovery and Re-investment Act*. Homelessness Prevention strategies are also identified in the *2011 SHP Exhibit 1 Milwaukee Continuum of Care Strategic Planning Objectives* and are in alignment with the national priorities established in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. The FY2011 ESG funded program components and activities include Homelessness Prevention for Individuals and Families and Youth.

The following is a description of the proposed program components and activities and the relevant local data and/or linkage to the national priorities.

**Homelessness Prevention** – A continuum of homeless prevention activities have been developed to ensure that individuals and families at-risk of becoming homeless are able to maintain stable housing. The ESG Homelessness Prevention activities that will be used include Housing Relocation and Stabilization Services and Financial Assistance. Homelessness Prevention including landlord/tenant mediation, eviction prevention and rent assistance are identified in the *2011 SHP Exhibit 1 Milwaukee Continuum of Care Strategic Planning Objectives* as both a short-term (12 month) and long-term (10 Year) strategy to decrease the number of homeless households with children. Additionally, the Homelessness Prevention activities contained in this plan are consistent with Objective 3 in the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Objective 3 states, “provide affordable housing to people experiencing or most at risk of homelessness.”

**Component 1: Landlord/Tenant Mediation, Financial Assistance and Short-Term Rental Assistance** at Community Advocates. Community Advocates will provide a range of housing services including landlord/tenant dispute resolution, case management, and the provision of short-term direct rental assistance.

**Component 2: Housing Stability Case Management, Housing Search and Placement, Financial Assistance and Medium-Term Rental Assistance** at Pathfinders, St. Aemilian-Lakeside and Walker’s Point Youth and Family Center. The service model combines assessment, case management and medium-term rental assistance to assist program participants to find and maintain safe and suitable housing. Youth are the leaseholders, but the payments on their behalf are made directly to the landlords.



This rental support is reduced over time to encourage youth towards self-sufficiency and personal empowerment. In addition, the collaboration uses an intensive case management service focused on referral and coordination of mainstream services suited to meeting the identified needs of the participants.

The collaboration serves youth ages 18 through 25 years old, both single and single parents with children. Pathfinders focuses on services to gay, lesbian, bisexual, transgender and questioning (LGBTQ) youth. St. Aemilian-Lakeside serves former foster care youth or youth currently aging out of the child welfare system and Walker's Point Youth and Family Center focuses on other single and parenting young adults. *Component 2* is aligned with Objective 8 in the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Objective 8 states "advance health and housing stability for youth aging out of systems such as foster care and juvenile justice."

In summary, the Homelessness Prevention program components and activities described above are consistent with Objective 10 in the *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*. Objective 10 states "transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing."

- **Identify any obstacles to addressing underserved needs in the community.**

**Response:** The City of Milwaukee, in consultation with the Milwaukee Continuum of Care, identified the following obstacles to addressing the underserved needs in the community specifically as it relates to Milwaukee's low-income citizens who are homeless or at-risk of becoming homeless: 1) Effectively accessing, securing and utilizing mainstream resources are barriers encountered by many individuals and families; 2) Misinformation and/or miscommunication about mainstream benefit eligibility requirements and/or services provided by mainstream service providers; 3) Difficulties in securing mainstream resources include cumbersome administrative and documentation requirements and; 4) Finally, once mainstream benefits have been secured, many individuals and families are not taking full advantage of those benefits.

To combat these barriers, the proposed ESG plan incorporates a mainstream benefits check up and assistance with securing and effectively using mainstream resources in each component.

**5c. Detailed Budget:** Include a detailed budget of planned activities and funding levels accounting for the entire second allocation and any reprogrammed funds from the first allocation.

FY 2011 Detailed Budget Table					
First Allocation		\$740,157.00	FY 2011 -		
Second Allocation		\$416,338.00	Emergency Shelter Grants/Emergency Solutions Grants		
Grant Amount		\$1,156,495.00	Program Allocations		
Total Administration		\$86,737.13			
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$692,575.00	\$0.00		\$692,575.00
	Rehab/Conversion				\$0.00
	Operations	\$511,366.00			\$511,366.00
	Essential Services	\$181,209.00			\$181,209.00
	Homelessness Prevention	\$47,582.00			\$47,582.00
	Administration				\$0.00
	<b>Emergency Shelter Grants Subtotal</b>	<b>\$740,157.00</b>	<b>\$0.00</b>		<b>\$740,157.00</b>
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	Renovation**			\$0.00	\$0.00
	Operation**			\$0.00	\$0.00
	Essential Service**			\$0.00	\$0.00
	URA Assistance**			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS			\$10,000	\$10,000
	Rapid Re-housing		\$0.00	\$0.00	\$0.00
	Housing Relocation and Stabilization Services			\$0	\$0.00
	Tenant-Based Rental Assistance			\$0	\$0.00
	Project-Based Rental Assistance			\$0	\$0.00
	Homelessness Prevention		\$0.00	\$356,338.00	\$356,338.00
	Housing Relocation and Stabilization Services			\$70,000.00	\$70,000
	Tenant-Based Rental Assistance			\$286,338.00	\$286,338.00
	Project-Based Rental Assistance			\$0	\$0.00
	Administration			\$50,000.00	\$50,000.00
	<b>Emergency Solutions Grants Subtotal</b>		<b>\$0.00</b>	<b>\$416,338.00</b>	<b>\$416,338.00</b>
			<b>Total Grant Amount:</b>		<b>\$1,156,495.00</b>

\*\*Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities(see Section III.B. of the Federal Notice).

**6. Written Standards for Provisions of ESG Assistance (must include the following:)**

**a. Standard policies and procedures for evaluating individuals' and families eligibility for assistance under ESG.**

**Response: Families/Singles/Youth**

Standard policies and procedures are being developed to ensure proper evaluation of families and individuals for assistance under ESG. Families will initially be evaluated using a standardized evaluation tool. The evaluation tool will be used by 211 to conduct a cursory assessment to determine demographics, income level, housing status, and the determination of which agency will best provide assistance to the family or individual. All individuals that contact 211 will have this assessment completed and will be either directed to a shelter, community case manager, or homeless prevention provider. Once a family has been referred to a shelter, within one week, the shelter will assess the family for Rapid Re-housing eligibility. Eligibility will be based on the uniform assessment tool that all agencies will utilize to ensure that each applicant is assessed properly. All individuals must be either homeless, at risk of homelessness or at imminent risk of homelessness. All individuals involved must not have any other appropriate subsequent housing options identified. Also, individuals must lack the financial resources and support networks to remain in the existing home. Individuals must also meet ESG income guidelines.

**b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers and mainstream service and housing providers.**

**Response: Families/Singles**

The ESG Substantial Amendment was developed in collaboration with the Milwaukee Continuum of Care (COC). COC funded agencies are currently working to ensure all recipients with housing issues are assessed and linked to the appropriate mainstream resources. All recipients will have their housing needs/barriers assessed. The assessment will result in the participant having a short-term and long-term housing case plan developed. The plan will have an overarching goal of long-term housing stability. Families will also be assessed for financial stability.

To maximize mainstream resources agencies will use ACCESS. ACCESS is an online tool hosted by the State of Wisconsin at [www.access.wi.gov](http://www.access.wi.gov) that allows individuals to ascertain their benefit eligibility as well as make application for multiple mainstream benefits. When necessary, as in the case of TANF, case managers assist clients in accessing services at one of the regional W-2/TANF centers. ACCESS provides an application for Food Share, Medicaid, Badger Care Plus, and Family Planning services. Case managers provide additional assistance if necessary to assist clients in addressing difficulties in fully accessing benefits for which they are eligible.

Families will be referred to local agencies for assistance with Earned Income Tax Credits and Homestead Credits. These benefits are helpful in increasing a families' chance to stabilize their housing situation. Currently, 211 assists in this coordination via referrals to the appropriate agencies. There has and will continue to be a coordinated effort with local, state and federal programming to ensure that resources are maximized for all families facing a potential homelessness situation.

**Response: Youth**

All three Milwaukee Youth Collaborative programs partner extensively with Milwaukee community shelters and essential service providers, homeless prevention and rapid re-housing assistance providers and other homeless assistance providers. These partners include, but are not limited to, Cathedral Center, Guest House, Lad Lake Connections, Pathfinders( Counseling Center), Wraparound, OYEAH and community resources that work directly with people who are living on the streets. Staff and administrators from all three programs connect frequently, both formally and informally, with identified resources to provide information about making a seamless referral to any of the three youth programs. As part of the COC's mission, the Milwaukee Youth Collaborative existing policies exhibit a willingness to coordinate services with other homeless prevention service providers.

**c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.**

**Response: Individuals and Families**

Not only has it has been determined by the COC that priority will be given to families that are literally homeless, families that are imminently at-risk of becoming homeless will also receive priority. Families that are eligible for these services will be prioritized using the uniform assessment tool. In order to receive financial assistance under the homelessness prevention program, the individual(s) must meet the "at risk" of homelessness definition and/or be at imminent risk of becoming homeless. If mediation doesn't prevent the homelessness situation, and no other viable solutions are present, the individual(s) will be referred to a shelter. Once an individual has entered shelter, he/she will be assessed for Rapid re-housing services. Primarily individuals in shelter will receive the following services: Housing Search and Placement and Housing Stability Case Management. If it is determined that services beyond those mentioned above, along with mainstream benefits will not stabilize the housing situation, a family may be assisted by being referred to some other program (for example transitional living).

**Response: Youth**

Not applicable given Milwaukee Youth Collaborative programs only provide homelessness prevention assistance. Youth must meet the "at risk" of homelessness definition or either the imminent risk of homelessness federal standards in order to be eligible for assistance.

**d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.**

**Response: Families and Singles**

Individual(s) receiving rental assistance under homelessness prevention will be provided with rental assistance to bring them current with their arrearages and/or the current months' rent. There will not be any medium-term assistance provided to families or individual(s). The amount of assistance needed will be determined by the case manager using the initial consultation and assessment tools.

**Response: Youth**

Each of the Milwaukee Youth Collaborative partners have established written standards and schedules of financial assistance that detail specific amounts of rent and utilities costs and how costs are incrementally assumed by each homelessness prevention program participant. While each program has its own schedule of financial assistance that is generally applied, the three youth collaborative partners share a goal of assisting youth in successfully acquiring financial independence in a predictable, equitable, and achievable manner. Program participants can also ask for individual adjustments to their established assistance schedule in the form of a written request for emergency assistance due to qualifying events (i.e.: loss of employment due to layoffs or temporary work assignments, etc.).

**e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.**

**Response: Families and Singles**

Family and Singles that are in need of Homelessness Prevention services will be assessed using the uniform assessment tool. These individual(s) will be provided with a maximum of \$1,000 of which could be used for short-term rental assistance, security deposit assistance, or rental arrears. Security deposit assistance will be given in instances when individuals will not be able to maintain their current housing situation without the assistance. The assistance will not adjust over time. Security deposits paid using Homelessness Prevention dollars will be refunded to the resident in accordance with State Statutes.

**Response: Youth**

As noted in item 6d, each of the Milwaukee Youth Collaborative partners have established written standards that govern the amount and schedule of rental assistance provided to program participants. For example, one of the youth collaborative partners has a 12-month program participation schedule that structures assistance as follows: the first 3 months of rental and utilities assistance is covered by the agency at 100%, followed by 3 months of program participants assuming responsibility for 25% of costs, 3 months at 50% of costs each covered by agency and participant, and finally 3 months of program enrollment where the participant assumes 75% of rental costs.

By ensuring that program participant costs are predictable and gradual, the likelihood of youth achieving successful financial independence and self-sufficiency is greatly increased.

**f. Standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homeless prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participants may receive assistance.**

**Response: Families and Singles**

Homelessness Prevention services will be provided to a family or individual once a year. The amount of time a family receives assistance will not exceed 12 months. The amount of financial assistance will not exceed one month of rental assistance and one month of rental arrears, not to exceed \$1,000. If a family must move, the security deposit may be paid using homelessness prevention funds; however, the total amount spent per client will not exceed \$1,000. All applicants will be assessed to maximize mainstream resources within the community. Individuals receiving assistance with relocation will have their units inspected for habitability standards and a visual lead inspection will take place.

**Response: Youth**

As noted in item 6d and 6e above, the Milwaukee Youth Collaborative has put in place a model of homeless prevention programming that provides housing stabilization and/or relocation services. Recognizing that youth needs are often complex and extensive, the youth programs use intensive case management including referral and coordination of mainstream services suited to meeting the needs of the participants. These services must promote the following areas: educational advancement, job development and attainment, development of independent living skills, achieving positive physical, mental and emotional health and avoiding contact with the criminal justice system. Case management must be held at least weekly with program youth, as well as group sessions where youth participate. If a participant leaves the program before completing it, and later wishes to return to the program, s/he may do so, but may not exceed the maximum number of 18 months total in the program.

**7. Describe the process for making sub awards.**

**Response:** The City's plan is to adopt the ESG allocation plan, policies and procedures and performance standards developed by the Milwaukee Continuum of Care and to allocate funds based on the subrecipients identified in the Continuum's plan. The COC has completed significant planning and preparatory work in preparation for the receipt of additional Emergency Solutions Grant funds. Additionally, the ESG allocation plan builds upon *Milwaukee's 10-Year Plan to End Homelessness*, *2011 Point in Time Survey of Milwaukee's Homeless Citizens*, *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness* and the experience of administering HPRP Homelessness Prevention and Rapid Rehousing programs since 2009.

Agencies that will be responsible for the ESG activities have been directly involved in the development of the plan and have the capacity to begin activities within thirty-days (30) of notification of plan approval.

**8. Describe how the Homeless Participation Requirement is met.**

**Response:** The City of Milwaukee's policymaking entity consists of elected officials and does not include an individual who is homeless or had previously been homeless. The City's plan to meet the Homeless Participation Requirement is to consult with individuals who are homeless or had previously been homeless through the Milwaukee Continuum of Care ESG subrecipients. Currently 100% of the ESG subrecipients meet the participation requirement under §576.405(a) by involving an individual who is homeless or had previously been homeless in one or more of the following capacities:

- Renovation, construction, maintenance or operation of ESG facilities
- Provision of ESG services
- Provision of services to occupants of facilities assisted with ESG funds
- Representation on the Board of Directors or other policy/decision-making body

**9. Performance Standards for evaluating ESG activities, in consultation with the local Continuum of Care.**

**Response:** The Performance Standards for evaluating ESG activities were developed in consultation with the Milwaukee Continuum of Care. *See Chart A: 2011 ESG Performance Standards located on the following page.*

## **Chart A: 2011 ESG Performance Standards**

<b>Homelessness Prevention</b>				
<b>Goal</b>	<b>Activity</b>	<b>Program Output Targets</b>	<b>Program Outcome Targets</b>	<b>Outcome Calculations</b>
<p>Assist individuals and families in maintaining their housing</p> <p><b>Universe:</b> # of individuals and families who present with a housing crisis</p>	<p>Housing Relocation &amp; Stabilization Services</p> <ul style="list-style-type: none"> <li>• Assessment &amp; Evaluation</li> <li>• Housing Stability Case Management</li> <li>• Housing Search &amp; Placement</li> <li>• Mediation</li> <li>• Short and Medium Term Rental Assistance</li> <li>• Financial Assistance</li> </ul>	<p>100% of individuals and families will be assessed for housing options at intake.</p> <p>Programs will advocate for and/or provide housing assistance to individuals and families with immediate housing options (expected to be 25% of all persons presenting with a housing crisis)</p>	<p>5% of individuals and 20% of families presenting with a housing crisis will have their homelessness prevented.</p>	<p># of individuals and families who received prevention assistance and did not enter residential homeless programs within 12 months <b>divided by</b> total # of clients who presented with a housing crisis.</p>



**10. New ESG Certifications (see attached)**

See attached ESG Certifications.

**C. Written Standards required for recipients who are eligible and decide to use part of the second allocation of FY 2011 funds for emergency shelter and street outreach activities. The written standards must include:**

**Response:** The City of Milwaukee will not use any of the second allocation of FY2011 funds for emergency shelter or street outreach activities.

- a. If funding essential services related to street outreach with the second allocation: standards for targeting and providing these services.**

N/A

- b. If funding any emergency shelter activities with the second allocation; policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG; including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations and persons with the highest barriers to housing.**

N/A

- c. If funding essential services related to emergency shelter with the second allocation; policies and procedures for assessing, prioritizing and reassessing individuals' and families' needs for essential services related to emergency shelter.

N/A

**D. Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the "at risk of homelessness" definition**

- If recipient plans to serve persons "at risk of homelessness," based on the risk factor "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness," describe specific characteristics associated with instability and increased risk of homelessness.

**Response:** The City of Milwaukee does not plan to use the risk factor under paragraph (1)(iii)(G) of the "at risk of homelessness" definition "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness" to determine client eligibility.

**E. Requirements for Optional Changes to the FY 2011 Annual Action Plan**

**1. Centralized or Coordinated Assessment System**

- If the recipient's jurisdiction or a portion of the recipient's jurisdiction, currently has a centralized or coordinated assessment system and the recipient or subrecipients utilize the centralized or coordinated assessment system, the recipient should describe the assessment system in the substantial amendment.

**Response:** The City of Milwaukee and the Milwaukee Continuum of Care currently do not have a centralized or coordinated assessment system. However, the Milwaukee COC Coordinated Entry Workgroup is currently working to create a centralized or coordinated assessment system. The Milwaukee COC Coordinated Entry Work Group is responsible for designing a new coordinated entry (CE) system to improve effective access for homeless people to homeless prevention, re-housing, shelter diversion, community case management, emergency shelter, transitional housing and other services to support housing stability. Specific activities include analysis of current shelter/transitional housing system, interviews with successful CE systems in other cities, design framework development, stakeholder review and feedback, and implementation planning. This system reform initiative will extend into 2012.

## 2. Monitoring

- **If existing monitoring procedures are not sufficient to allow recipients to monitor compliance with the new requirements, HUD encourages recipients to update their monitoring standards and procedures in the process of submitting this substantial amendment. This should address appropriate levels of staffing.**

**Response:** CDGA will ensure compliance with all Federal program regulations for the use of ESG funds. With a focus on ensuring compliance with program requirements, CDGA will include program requirements in all ESG contractual agreements, provide technical assistance where necessary, one-on-one and in small groups, often on site and at the beginning of the program year as well as when programs are underway. CDGA defines clear expectations regarding performance standards and policies and procedures to follow. Involved are new subrecipients, new staff of existing subrecipients, existing subrecipients experiencing problems and existing subrecipients undertaking new activities. CDGA will also fund provision of technical assistance to funded subrecipients to include management, financial operations and board and staff development.

CDGA will monitor and evaluate activities to be carried out in furtherance of meeting goals and objectives set forth in the Annual Action Plan as it pertains to the use of ESG funds. CDGA monitoring staff will continue to utilize a very detailed monitoring process which includes extensive reporting of grantee activity. As a condition of payment, which is on a reimbursable basis, agencies will be required to submit monthly financial and programmatic reports. CDGA monitoring staff will review these reports to determine that submitted costs are eligible and that the funded activity is being performed to a satisfactory level. In addition, CDGA monitoring staff will maintain extensive contact with funded agencies and provide technical assistance to groups where needed. Agencies needing additional technical assistance will be referred to the CDBG-funded technical assistance providers for additional and ongoing assistance to help improve agency efficiency and accountability.

Informal and formal monitoring visits will be conducted to ensure compliance with program requirements. Risk assessments and in-house desk audits will be performed annually of all funded agencies.

The City Comptroller's office, the fiscal arm of the Community Development Grants Administration, will conduct annual financial audits of all funded groups and monitor the timeliness of expenditures.